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REMARKS

In view of the following discussion, the Applicants submit that none of the claims now pending in the application is unpatentable under the provisions of 35 U.S.C. §103. Thus, the Applicants believe that all of these claims are now in allowable form.

I. ELECTION/RESTRICTION

The Applicants hereby affirm the election without traverse made on February 19, 2008 to prosecute the invention of claims 1-10 and 14-20. Claims 11-13 are withdrawn.

II. OBJECTIONS TO THE SPECIFICATION

A. Objection to the Abstract

The Abstract stands objected to for exceeding the limit of 150 words. In response, the Applicants have amended the Abstract, as indicated above, in order to conform to the 150-word limit. In light of this amendment, the Applicants respectfully request that the objection to the Abstract be withdrawn.

B. Objection to the Specification

The Specification stands objected to for failing to provide clear support or antecedent basis for the "computer readable medium" claimed in claims 14-20. In response, the Applicants have amended paragraph [0086] of the Specification, as indicated above, in order to clarify that the described software processes may be stored on a computer readable medium. The Applicants respectfully submit that no new matter is entered as a result of this amendment. In light of this amendment, the Applicants respectfully request that the objection to the Specification be withdrawn.

III. REJECTION OF CLAIMS 1-20 UNDER 35 U.S.C. § 103

A. Claims 1-2, 6-9, 14, and 18-20

Claims 1-2, 6-9, 14, and 18-20 stand rejected under 35 U.S.C. §103 as being unpatentable over the Grimm et al. patent (United States Patent No. 5,828,843, issued

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October 27, 1998, hereinafter "Grimm") in view of the Modiri et al. patent (United States Patent No. 6,192,401, issued February 20, 1001, hereinafter "Modiri"). In response, the Applicants have amended independent claims 1 and 2 in order to more clearly recite aspects of the present invention. Claims 6, 14, and 18-20 have been cancelled without prejudice. Applicants do <u>not</u> concede that the subject matter encompassed by claims 6, 14, and 18-20 is not patentable over the art cited by the Examiner; rather, claims 6, 14, and 18-20 were cancelled solely to facilitate expeditious prosecution of the pending claims. Applicants respectfully reserve the right to pursue claims, including the subject matter encompassed by cancelled claims 6, 14, and 18-20 and additional claims, in one or more continuing applications.

Primarily, the Applicants respectfully submit that Grimm and Modiri, singly or in any permissible combination, fail to teach or suggest the novel invention of obtaining a user's communication interest <u>as represented by at least one of: a user request for a content update or a user subscription to a specific data item or to a set of proximal data sources</u> and then <u>forming a feature vector or performing node clustering based in part on the communication interest</u>, as recited by Applicants' independent claims 1 and 2.

By contrast, the combination of Grimm and Modiri at best teaches that clients and servers are matched into sets based on <u>personal information about the user</u> (*e.g.*, "skill level, age, people the user doesn't want to be matched with," Grimm, column 2, lines 63-64). This is not the same as clustering or forming a feature vector based on the user's <u>communication interest</u>, namely, <u>a user request for a content update or a user subscription to a specific data item or to a set of proximal data sources</u>, as claimed by the Applicants.

Specifically, the Applicants' independent claims 1 and 2 positively recite:

1.   A method of constructing a multi-type feature vector comprising the steps of:
      obtaining a user's communication interest <u>as represented by at least one of: a user request for a content update or a user subscription to a specific data item or to a set of proximal data sources</u>;
      obtaining network attributes;

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>   obtaining application attributes; and
>   forming a feature vector based on the communication interest, network
> attributes, and application attributes. (Emphasis added)

2.   A method of clustering a multi-type vector space comprising the steps of:
        obtaining network attributes from a network having a plurality of nodes;
        obtaining application attributes of an application;
        obtaining user communication interest as represented by at least one of: a
user request for a content update or a user subscription to a specific data item or
to a set of proximal data sources; and
        clustering the network nodes based on the network attributes, the application
attributes, and the communication interest. (Emphasis added)

As discussed above, Grimm and Modiri, singly or in any permissible combination, fail to teach or suggest the novel invention of obtaining a user's communication interest as represented by at least one of: a user request for a content update or a user subscription to a specific data item or to a set of proximal data sources and then forming a feature vector or performing node clustering based in part on the communication interest, as recited by Applicants' independent claims 1 and 2. Accordingly, the Applicants respectfully submit that independent claims 1 and 2 are not unpatentable over Grimm in view of Modiri and are allowable.

Claims 7-9 depend from claim 2 and recite additional features. As such, and for at least the reasons stated above with respect to claim 2, the Applicants respectfully submit that claims 7-9 are also not unpatentable over Grimm in view of Modiri and are allowable.

B. Claims 3-4 and 15-16

Claims 3-4 and 15-16 stand rejected under 35 U.S.C. §103 as being unpatentable over Grimm in view of Modiri and further in view of the Johnson patent (United States Patent No. 6,078,946, issued June 20, 2000, hereinafter "Johnson"). In response, the Applicants have amended independent claim 2 as discussed above in order to more clearly recite aspects of the present invention. Claims 15-16 have been

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cancelled without prejudice. Applicants do <u>not</u> concede that the subject matter encompassed by claims 15-16 is not patentable over the art cited by the Examiner; rather, claims 15-16 were cancelled solely to facilitate expeditious prosecution of the pending claims. Applicants respectfully reserve the right to pursue claims, including the subject matter encompassed by cancelled claims 15-16 and additional claims, in one or more continuing applications.

As discussed above, Grimm in view of Modiri fails to teach or suggest the novel invention of obtaining a user's communication interest <u>as represented by at least one of: a user request for a content update or a user subscription to a specific data item or to a set of proximal data sources</u> and then <u>forming a feature vector or performing node clustering based in part on the communication interest</u>, as recited by Applicants' independent claim 2. Johnson fails to bridge this gap in the teachings of Grimm and Modiri. As such, the Applicants respectfully submit that claim 2 is also not unpatentable over Grimm in view of Modiri and further in view of Johnson.

Claims 3-4 depend from claim 2 and recite additional features. As such, and for at least the reasons stated above with respect to claim 2, the Applicants respectfully submit that claims 3-4 are also not unpatentable over Grimm in view of Modiri and further in view of Johnson and are allowable.

C. Claims 5 and 17

Claims 5 and 17 stand rejected under 35 U.S.C. §103 as being unpatentable over Grimm in view of Modiri and further in view of the Solotorevsky et al. patent application (United States Patent Application Publication No. 2005/0010571, published January 13, 2005, hereinafter "Solotorevsky"). In response, the Applicants have amended independent claim 2 as discussed above in order to more clearly recite aspects of the present invention. Claim 17 has been cancelled without prejudice. Applicants do <u>not</u> concede that the subject matter encompassed by claim 17 is not patentable over the art cited by the Examiner; rather, claim 17 was cancelled solely to facilitate expeditious prosecution of the pending claims. Applicants respectfully reserve

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the right to pursue claims, including the subject matter encompassed by cancelled claim 17 and additional claims, in one or more continuing applications.

As discussed above, Grimm in view of Modiri fails to teach or suggest the novel invention of obtaining a user's communication interest <u>as represented by at least one of: a user request for a content update or a user subscription to a specific data item or to a set of proximal data sources</u> and then <u>forming a feature vector or performing node clustering based in part on the communication interest</u>, as recited by Applicants' independent claim 2. Solotorevsky fails to bridge this gap in the teachings of Grimm and Modiri. As such, the Applicants respectfully submit that claim 2 is also not unpatentable over Grimm in view of Modiri and further in view of Solotorevsky.

Claim 5 depends from claim 2 and recites additional features. As such, and for at least the reasons stated above with respect to claim 2, the Applicants respectfully submit that claim 5 is also not unpatentable over Grimm in view of Modiri and further in view of Solotorevsky and is allowable.

D. Claim 10

Claim 10 stands rejected under 35 U.S.C. §103 as being unpatentable over Grimm in view of Modiri and further in view of the Tang et al. patent application (United States Patent Application Publication No. 2005/0076137, published April 7, 2005, hereinafter "Tang"). In response, the Applicants have amended independent claim 2 as discussed above in order to more clearly recite aspects of the present invention.

As discussed above, Grimm in view of Modiri fails to teach or suggest the novel invention of obtaining a user's communication interest <u>as represented by at least one of: a user request for a content update or a user subscription to a specific data item or to a set of proximal data sources</u> and then <u>forming a feature vector or performing node clustering based in part on the communication interest</u>, as recited by Applicants' independent claim 2. Tang fails to bridge this gap in the teachings of Grimm and Modiri. As such, the Applicants respectfully submit that claim 2 is also not unpatentable over Grimm in view of Modiri and further in view of Tang.

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Claim 10 depends from claim 2 and recites additional features. As such, and for at least the reasons stated above with respect to claim 2, the Applicants respectfully submit that claim 10 is also not unpatentable over Grimm in view of Modiri and further in view of Tang and is allowable.
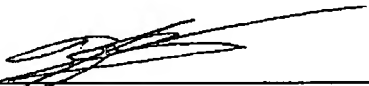
IV. CONCLUSION

Thus, the Applicants submit that all of the presented claims fully satisfy the requirements of 35 U.S.C. §103. Consequently, the Applicants believe that all of the presented claims are presently in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issue are earnestly solicited.

If, however, the Examiner believes that there are any unresolved issues requiring the issuance of a final action in any of the claims now pending in the application, it is requested that the Examiner telephone Mr. Kin-Wah Tong, Esq. at (732) 530-9404 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

6/5/08
Date

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